

September 19, 2019

To: HTGCD Board Members

Rule 15 (JWGMZ) - Comments & Concerns from WWSC Board of Directors

(15.1.2)

-Concern that using production numbers from 2017 to establish monthly baseline production amount is accurate and fair to both the District and the Public Water Supply.

-Clarification within the rules concerning a separate permit for WWSC Well #6. Effect on existing permit (AC. FT.), separate application and permit fee, etc.

-Clarification that Section (15.1.2) 4) does not contradict Section (15.2.2). Are these separate numbers? If so, numbers being permit amount and baseline production?

(15.2.1)

-Understanding as written that an allowance for accounted and unaccounted water is already included in whatever the monthly baseline production amount is. There leaves no margin for error if there are unforeseen complications, incidents, or problems within WWSC plant or system in any given month.

-Major concern to WWSC is the posting of the curtailment percentage by HTGCD and the amount of time curtailment information has to reach affected customers and to be able to reduce pumpage in such a time to avoid fines set forth by the District.

-WWSC is concerned of one section or pressure plane (serviced by Well #6) within our CCN having to follow a separate drought contingency plan, curtailments, and restrictions in order to comply with Rule 15.

(15.2.3)

-WWSC has multiple concerns with this rule. In our opinion, a 40% cut back in production will be nearly impossible at any CFS. These numbers put WWSC customers in Drought Stage IV within our existing Drought Contingency Plan. Once again, there is concern for WWSC members following different curtailments within one CCN. For example: Members within JWGMZ could be asked to cut back 40% at the same time the remaining members of WWSC maybe be asked to reduce 20% (depending on drought stage).

-Another concern would be for clarity from the District in regards to Jacob's Well CFS at 0 (zero) after implementation of Rule 15 and after compliance by WWSC to achieve reduction in production that the District has set forth. What happens then?



Garrett Allen
General Manager